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8 **Southern Nevada Office:**

9 601 South Seventh Street
10 Las Vegas, NV 89101
11 Tel: (702) 387-8633
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13 Attorneys for NAPHCARE, INC. an Alabama Corporation; HARRY DURAN, M.D., in his
14 individual capacity; ERIC LOPEZ, P.A., in his individual capacity; RACHEL SCHEIBLICH
15 (formerly known as "RUDD") in her individual capacity; KENDRA MEYER (formerly known
16 as "SCHULTZ") in her individual capacity and RAYMOND MONDORA

17 UNITED STATES DISTRICT COURT
18 DISTRICT OF NEVADA

19 JUSTIN L. TRIPP,

20 Plaintiff,

21 vs.

22 CLARK COUNTY, LAS VEGAS POLICE
23 DEPARTMENT, OFFICER J. TORRES,
24 OFFICER M. ROSE, JOHN DOE #1,
25 NAPHCARE, INC., et al.

26 Defendants.

Case No.: 2:17-cv-01964-JCM-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISPOSITIVE
MOTION DEADLINE**

27 Pursuant to LR7-1 and LR 26-3, the parties, by and through their respective counsel of
28 record, hereby stipulate and request this Court extend the dispositive motion deadline in the
above captioned case for ninety (90) days.

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A. DISCOVERY COMPLETED TO DATE:

1. Defendants' Interrogatories and Request for Production of Documents to Plaintiff and Plaintiff's Responses;
2. Plaintiff's Interrogatories and Request for Production of Documents to Defendants and Defendants' Responses;
3. Deposition of Plaintiff;
4. Disclosure of Experts

B. DISCOVERY REMAINING TO BE COMPLETED

None – Discovery is closed at this time.

C. REASON FOR REQUEST FOR EXTENSION OF DISCOVERY DEADLINES

The parties have been diligent in completing discovery. There are several pending motions that are awaiting orders including whether the Court will permit Dr. Dean Yarbrow to be served as a defendant and whether the Court will permit a court-appointed expert for Plaintiff. For these reasons, the parties are stipulating to extend the dispositive motion deadline. This stipulation is made in good faith without any intent to delay this matter.

D. CURRENT DISCOVERY DEADLINES

- | | |
|---|-------------------|
| 1. Close of Discovery | Closed |
| 2. Last Day to Amend Pleadings or Add Parties | Closed |
| 3. Initial Expert Designation | Closed |
| 4. Dispositive Motions | December 28, 2020 |
| 5. Pretrial Order | January 26, 2021 |

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**E. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING
DISCOVERY**

- | | |
|---|----------------|
| 1. Close of Discovery: | Closed |
| 2. Last Day to Amend Pleadings and Add Parties: | Closed |
| 3. Initial Expert Designation: | Closed |
| 4. Rebuttal Expert Designation: | Closed |
| 5. Last Day for Dispositive Motions: | March 26, 2021 |
| 6. Pretrial Order | April 26, 2021 |

For the foregoing reasons, the parties respectfully request that the Court enter an Order adopting the 90-day extension for dispositive motions set forth in this Stipulation.

Dated: December 4, 2020

Dated: December 4, 2020

KAEMPFER CROWELL

LAURIA TOKUNAGA GATES & LINN, LLP

/s/ Lyssa Anderson, Esq.

/s/ Paul A. Cardinale, Esq.

By: _____
Lyssa Anderson, Esq.
Ryan Daniels, Esq.
Attorney for Defendant
Las Vegas Metro PD

By: _____
Paul A. Cardinale, Esq.
Attorney for Defendants
*NAPHCARE, INC. an Alabama Corporation;
HARRY DURAN, M.D., in his individual
capacity; ERIC LOPEZ, P.A., in his individual
capacity; RACHEL SCHEIBLICH (formerly
known as "RUDD") in her individual
capacity; KENDRA MEYER (formerly known
as "SCHULTZ") in her individual capacity
and RAYMOND MONDORA*

Dated: December 4, 2020

Dated: December 4, 2020

HATFIELD & ASSOCIATES, LTD.

DEPUTY DISTRICT ATTORNEY – CIVIL

/s/ Trevor J. Hatfield, Esq

/s/ Jeffrey S. Rogan, Esq.

By: _____
Trevor J. Hatfield, Esq.
Ryan Daniels, Esq.
Attorney for Plaintiff
Justin L. Tripp

By: _____
Steven B. Wolfson, Esq.
Jeffrey S. Rogan, Esq.
Attorney for Defendant
Clark County

ORDER

IT IS SO ORDERED that the instant Stipulation to Extend Dispositive Motion Deadline is **GRANTED** and the discovery deadlines shall be amended as follows:

Close of Discovery:	<i>Closed</i>
Last Day to Amend Pleadings and Add Parties:	<i>Closed</i>
Initial Expert Designation:	<i>Closed</i>
Rebuttal Expert Designation:	<i>Closed</i>
Last Day for Dispositive Motions:	March 26, 2021
Joint Pre-Trial Order	April 26, 2021

IT IS SO ORDERED

DATED: 10:09 am, December 08, 2020



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

Liesa M. Costa

From: Lyssa Anderson <landerson@kcnvlaw.com>
Sent: Friday, December 4, 2020 4:49 PM
To: Jeffrey Rogan
Cc: Paul A. Cardinale; Freda Brazier; Trevor Hatfield; Liesa M. Costa
Subject: Re: Justin Tripp v. Clark County, et al, Case No. 2:17-cv-01964-JCM-BNW

You may add mine as well.

Best Regards,
Lyssa S. Anderson

On Dec 4, 2020, at 4:21 PM, Jeffrey Rogan <Jeffrey.Rogan@clarkcountyda.com> wrote:

Paul,

You can attach my e-signature to the Stipulation.

Jeff

From: Paul A. Cardinale <pcardinale@ltglaw.net>
Sent: Friday, December 4, 2020 4:01:35 PM
To: Freda Brazier <freda@hatfieldlawassociates.com>; Lyssa Anderson <landerson@kcnvlaw.com>; Jeffrey Rogan <Jeffrey.Rogan@clarkcountyda.com>; Trevor Hatfield <thatfield@hatfieldlawassociates.com>
Cc: Liesa M. Costa <lcosta@ltglaw.net>
Subject: FW: Justin Tripp v. Clark County, et al, Case No. 2:17-cv-01964-JCM-BNW

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My apologies here is the revised one which includes a signature line for Jeff.

<image001.jpg>

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Liesa M. Costa

From: Trevor Hatfield <thatfield@hatfieldlawassociates.com>
Sent: Friday, December 4, 2020 4:13 PM
To: Paul A. Cardinale
Cc: Freda Brazier; Lyssa Anderson; jeffrey.rogan@clarkcountyda.com; Liesa M. Costa
Subject: Re: FW: Justin Tripp v. Clark County, et al, Case No. 2:17-cv-01964-JCM-BNW

Yes, I approve. You can e-sign for me. In re: DPSO, ordinarily the Discovery Orders for these cases are exempt from discovery plans so i just don't know why there is this deadline. Maybe due to an added party?

Trevor J. Hatfield, Esq.,
HATFIELD & ASSOCIATES, LTD.
703 S. Eighth St.
Las Vegas, NV 89101
(702) 388-4469
thatfield@hatfieldlawassociates.com

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On Fri, Dec 4, 2020 at 4:01 PM Paul A. Cardinale <pcardinale@ltglaw.net> wrote:

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Paul A. Cardinale

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From: Paul A. Cardinale
Sent: Friday, December 4, 2020 4:00 PM
To: Freda Brazier <freda@hatfieldlawassociates.com>; Lyssa Anderson <landerson@kcnvlaw.com>; jeffrey.rogan@clarkcountyda.com; Trevor Hatfield <thatfield@hatfieldlawassociates.com>